

**Joint Statement of Woods Services, Inc. (“Woods”) and  
Disability Advocates, Inc. d/b/a Disability Rights New York (“DRNY”)**

Plaintiff, Woods Services, Inc. (“Woods”), and Defendant, Disability Rights New York (“DRNY”), have settled and resolved their claims and counterclaims that are the subject of a lawsuit brought by Woods in the U.S. District Court for the Eastern District of Pennsylvania (“the Lawsuit”). The Lawsuit arose out of DRNY’s Report dated October 30, 2017 titled “Abuse and Neglect of New York Residents at Woods Services in Pennsylvania” (the “Report”) and Woods’ written response to the Report (the “Response”). DRNY is the nationally regarded non-profit protection and advocacy system for New Yorkers with disabilities and, in that capacity, has the right to represent and advocate for New York residents with disabilities no matter where they reside. Woods is a nationally regarded non-profit provider of residential, educational and related services to children and adults with intellectual and developmental disabilities and acquired brain injury who also have complex and intensive medical and behavioral needs. Woods is highly regulated by Pennsylvania regulatory agencies, which have consistently found that Woods meets or exceeds all requirements for licensure.

Beginning in mid-2016, DRNY conducted an investigation of Woods at Woods’ main campus in Langhorne, Pennsylvania. This investigation culminated in the Report, which was published by DRNY in October 2017. Woods then issued the Response to the Report and filed the Lawsuit, which asserted claims for defamation and related causes of action arising from the Report. DRNY then filed counterclaims asserting defamation and related claims against Woods arising from the Response.

Having now had further opportunity to review records and other evidence and with the benefit of hindsight, DRNY and Woods feel that the Report and the Response to the Report could have been more cooperative and collaborative, and have agreed that going forward that will be the case. DRNY regrets not giving Woods a meaningful opportunity to either respond to or provide relevant information concerning the assertions in the Report before DRNY published it.

Both parties have concluded that rather than engage in further litigation concerning these matters, the public interest which they both serve would be furthered by a settlement, the terms of which provide (1) that the Report and the Response are permanently withdrawn, and will be removed from the websites of DRNY and Woods respectively, will not be further disseminated, and should not be used or relied upon by any third parties for any purpose; (2) for procedures and policies that will govern and help ensure that future interactions between DRNY and Woods will be cooperative and cordial; and (3) certain other terms which shall remain confidential.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**WOODS SERVICES, INC.**

**Plaintiff,**

**v.**

**DISABILITY ADVOCATES, INC., d/b/a  
DISABILITY RIGHTS NEW YORK**

**Defendant.**

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**CIVIL ACTION NO. 18-00296**

**STIPULATION AND PROPOSED ORDER**

**WHEREAS**, Woods Services, Inc. ("Woods") initiated this action by filing a complaint asserting defamation and other claims against Disability Advocates, Inc., d/b/a Disability Rights New York ("DRNY") arising out of DRNY's publication on October 30, 2017 of a document titled "Abuse and Neglect of New York State Residents at Woods Services in Pennsylvania" (the "Report");

**WHEREAS**, DRNY filed defamation and other counterclaims against Woods arising out of Woods' publication on October 30, 2017 of its response to the Report (the "Response");

**WHEREAS**, Woods and DRNY have agreed to resolve the claims and counterclaims via a settlement agreement and joint public statement; and

**NOW THEREFORE**, in connection with their resolution of the claims and counterclaim, Woods and DRNY **STIPULATE** as follows;

1. DRNY and Woods withdraw and deem to be annulled the Report and the Response, respectively.

2. DRNY and Woods, on behalf of themselves and their employees and agents, expressly disclaim any reliance on, respectively, the Report and the Response, or any drafts or parts thereof.
3. Neither DRNY nor Woods, nor any of their employees or agents, will (a) further disseminate the Report or the Response or any drafts or parts thereof, (b) refer any person or entity to the Report or Response, (c) vouch for the Report or Response, (d) authenticate the Report or the Response for any purpose under the Federal Rules of Evidence or any state's rules of evidence, or (e) take any other action or make any other communication that is contrary to the above disclaimer of the Report and Response.

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SO ORDERED:

 6/18/19  
Michael M. Baylson  
United States District Judge